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**From:**

**Sent:** Tuesday, April 07, 2009 12:31:53 PM

**To:**

**Cc:**

**Subject:** RE: TEFRA election

Section 708(a) deems a partnership terminated "for purposes of this subchapter". "This subchapter" is subchapter K which governs the accounting of partnership items. Thus, while a termination might affect an accounting election under section 703(b) (        would have to opine on this), a technical termination might not affect an election made under another subchapter such as the TEFRA subchapter C of Chapter 63. So the election not to be treated as a small partnership under section 6231(a)(1) may still be effective, notwithstanding the technical termination.